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13 VERIZON WIRELESS and VERIZON COMMUNICATIONS, INC

14 **UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 TERESA MACCLELLAND; KAREN  
16 UMBERGER; SCOTT WILLITS; MICHAEL  
BRANOM; MOLLY BROWN; MICHAEL  
17 CARNEY; TIM FRASCH; PATRICIA GAGAN;  
ANNA GUTIERREZ; LINDA JENKINS;  
18 AUGUSTUS JOHNSON; WILLIAM KAUPELIS;  
MARILYN KAYE; JANETTE LISNER;  
19 WILLIAM ERIC LOUGH; DAVID MASSARO;  
LOUISE MONSOUR; DARLEEN PEREZ;  
20 GABRIELLE POZZUOLI; VALERIE REED;  
BRUCE SCHRAMM; KERRY SHOWALTER;  
21 JOHN ST. JARRE; GLORIA STERN; EDNA  
TOY; TERESA TOY; and VANESSA WEST; For  
22 Themselves, As Private Attorneys General, and On  
23 Behalf Of All Others Similarly Situated,

24 Plaintiffs,

25 v.

26 CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS; and VERIZON  
27 COMMUNICATIONS INC.,

28 Defendants.

CASE NO. 3:21-cv-08592-EMC

**JOINT STIPULATED REQUEST  
AND [PROPOSED] ORDER FOR  
CONTINUANCE OF CASE  
MANAGEMENT CONFERENCE  
AND ASSOCIATED DEADLINES**

The Hon. Edward M. Chen

1 Pursuant to this Court's Order (ECF No. 9) and Local Rules 6-2 and 7-12, the Parties stipulate  
2 and declare as follows:

3 WHEREAS, Plaintiffs filed their First Amended Complaint ("FAC") on December 31, 2021  
4 (ECF No. 10);

5 WHEREAS, Plaintiffs served their FAC on January 19, 2022 (ECF No. 15);

6 WHEREAS, the Parties have sought one prior extension: by joint stipulation the Parties agreed  
7 to a briefing schedule for any motion Verizon filed in response to the FAC (ECF No. 16);

8 WHEREAS, Verizon filed a Motion to Compel Arbitration and Stay Proceedings ("Motion")  
9 on March 4, 2022 (ECF No. 20);

10 WHEREAS, a hearing on Verizon's Motion is scheduled for May 12, 2022 at 1:30 p.m. (*Id.*);

11 WHEREAS, a Case Management Conference is currently scheduled for March 22, 2022, at  
12 1:30 p.m., and a Case Management Statement is due no later than March 15, 2022 (ECF No. 9);

13 WHEREAS, this Court's order provides that any request to reschedule the Case Management  
14 Conference must show good cause and be made by written stipulation within 10 days of the  
15 conference (*Id.* at ¶ 2);

16 WHEREAS, in the interest of efficiency and in compliance with the 10-day period specified by  
17 the Court's order (ECF No. 9), the Parties agree that Verizon's pending Motion constitutes good cause  
18 to continue the Case Management Conference to the same day of the hearing on Verizon's pending  
19 Motion;

20 WHEREAS, this request is made in good faith and not for the purposes of delay or any  
21 improper purpose;

22 NOW, THEREFORE, THE PARTIES STIPULATE AND REQUEST that: the Case  
23 Management Conference be continued to May 12, 2022 at 1:30 p.m., the Case Management Statement  
24 be due by May 5, 2022, and that all deadlines associated with the March 22, 2022 Case Management  
25 Conference be vacated.

1 DATED: March 10, 2022

QUINN EMANUEL URQUHART & SULLIVAN, LLP

2  
3 By /s/ Shon Morgan

4 Shon Morgan  
Attorneys for Defendants VERIZON WIRELESS  
5 and VERIZON COMMUNICATIONS, INC.

6 DATED: March 10, 2022

HATTIS & LUKACS

7  
8 By /s/ Paul Karl Lukacs

9 Paul Karl Lukacs  
Attorneys for Plaintiffs

10  
11  
12 **SIGNATURE ATTESTATION**

13 Pursuant to Local Rule 5-1, I hereby attest that concurrence in the filing of this document has  
14 been obtained from each of the other Signatories.

15  
16 Dated: March 10, 2022

17 /s/ Shon Morgan  
18 Shon Morgan

**[PROPOSED] ORDER**

Before the Court is the parties' stipulated request to continue the Case Management Conference and associated deadlines. The Court has considered the stipulation, found good cause, and hereby ORDERS as follows: The Case Management Conference is hereby continued to May 12, 2022 at 1:30 p.m., and the Case Management Statement must be filed by no later than May 5, 2022. All deadlines associated with the March 22, 2022 Case Management Conference, are hereby vacated.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Edward M. Chen  
United States District Judge